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The Honorable Robert S. Lasnik

## UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

ROBERT WILSON and ERIC McNEAL, individually and on behalf of all similarly situated individuals,

Plaintiffs,

v.

MAXIM HEALTHCARE SERVICES, INC., a Maryland corporation,

Defendant.

No. 2:14-cv-00789-RSL

STIPULATED MOTION FOR DISMISSAL AND PROPOSED ORDER

NOTE ON MOTION CALENDAR: August 7, 2017

## STIPULATED MOTION FOR DISMISSAL

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) and Local Rule 10(g),

Defendant Maxim Healthcare Services, Inc., together with Plaintiffs Robert Wilson and Eric

McNeal (collectively, the "Parties"), by and through the undersigned counsel, respectfully move
the Court to enter the stipulated Order as set forth below.

## STIPULATION

The Parties hereby stipulate to the voluntary dismissal of the action in its entirety, with prejudice, as to the remaining three Opt-in Plaintiffs: Taysir Yamin, Paulette Jackson, and Michael Crother. Mr. Yamin's and Ms. Jackson's dismissals are warranted because they have

STIPULATED MOTION FOR DISMISSAL -- 1

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resolved their claims through individual settlement agreements with Defendant. Mr. Crother is deceased and his family members have informed Plaintiffs' counsel in writing that they will not pursue a letter of authority to effectuate his settlement agreement. As such, his dismissal is warranted, too.

With these dismissals, all remaining claims in this action have now been dismissed and, as such the matter may be closed

٦	as such, the matter may be closed.	
7		
8	SO STIPULATED:	
9	By: /s/ Jason J. Thompson Jason J. Thompson	By: /s/ Thomas F. Hurka Thomas F. Hurka, Pro Hac Vice
10	Jesse L. Young SOMMERS SCHWARTZ PC	MORGAN, LEWIS & BOCKIUS LLP 77 W. Wacker Drive, Fifth Floor
11	One Towne Square, Ste. 1700	Chicago, IL 60601
12	Southfield, MI 48076 Tel: (248) 355-0300	Tel: (312) 324-1000 Email: thomas.hurka@morganlewis.com
13	Email: jthompson@sommerspc.com Email: jyoung@sommerspc.com	By:/s/ Kaiser H. Chowdry
14	Email: Jy Cang @ Sommer spectorin	Lincoln O. Bisbee, Pro Hac Vice
15	By: /s/ Jacob R. Rusch	Kaiser H. Chowdhry, Pro Hac Vice Amanda C. Dupree, Pro Hac Vice
16	Jacob R. Rusch JOHNSON BECKER, PLLC	MORGAN, LEWIS & BOCKIUS LLP 1111 Pennsylvania Ave., NW
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19	<b>,</b>	Email: kaiser.chowdhry@morganlewis.com Email: amanda.dupree@morganlewis.com
20	<i>By: /s/Rebecca J. Roe</i> Rebecca J. Roe	By: /s/ Clemens H. Barnes
21	Adam J. Berger	Clemens H Barnes
22	SCHROETER GOLDMARK & BENDER	Daniel J. Oates MILLER NASH GRAHAM & DUNN LLP
23	810 Third Ave., Ste. 500 Seattle, WA 98104	(SEA) 2801 Alaskan Way
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STIPULATED MOTION FOR DISMISSAL - 2

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Attorneys for Plaintiffs

## Case 2:14-cv-00789-RSL Document 126 Filed 08/07/17 Page 6 of 6

The Honorable Robert S. Lasnik United States District Judge

**ORDER** IT IS SO ORDERED. Dated this 10 day of Hugust 10 11 12 13 14 15 16 17

STIPULATED MOTION FOR DISMISSAL -- 6

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